Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of

Amendment of the Commission's
Rules and Policies to Increase
Subscribership and Usage of the
Public Switched Network

CC Docket No. 95-115

EXHIBIT "B"

A LIFELINE ENROLLMENT AND REVALIDATION MODEL FOR A COMPETITIVE LOCAL EXCHANGE INDUSTRY IN NEW YORK STATE

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

THREE EMPIRE STATE PLAZA, ALBANY, NY 12223-1350

PUBLIC SERVICE COMMISSION

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AUG 181995

MAUREEN O. HELMER General Connect

JOEN C. CRARY
Becretary

August 16, 1995

Re: Case 94-C-0095 - Competition II (Module 1 - LifeLine Enrollment Program)

TO ALL ACTIVE PARTIES:

At the June 28, 1995 meeting concerning LifeLine issues, B. Robert Piller of PULP orally presented a model for converting existing LifeLine enrollment and revalidation programs, which are in place for New York Telephone Company and Rochester Telephone Corporation, to a state-wide program in a multi-provider environment. At the request of the meeting participants, PULP has prepared a draft of its proposed model. We appreciate PULP's effort and believe the draft model provides a good foundation for further work toward the creation of a workable LifeLine enrollment and revalidation program.

The ability of the data base administrator to identify which local exchange providers are available for each "non-matched" LifeLine eligible recipient (i.e., a LifeLine eligible individual without phone service) is an important technical point. Therefore, we request that the carriers that would be participating in the LifeLine enrollment program develop proposals that address this concern, before we convene another technical conference. Staff has asked Messrs. Zinnecker, Devine and Sawhney of NYSTA, MFS and the Access Pool respectively, to spearhead this effort. We request a response on this matter, as well as any other matters, by the end of September. In the meantime, we encourage informal dialogue among interested participants, and would welcome any suggestions or comments that you may have on the proposed model.

For your convenience, the flip chart notes from the June 28, 1995 meeting are also enclosed.

Sincerely,

Peter McGowan

Staff Counsel

Enclosures

PMM:dm\k\Mod1-Parties-ltr.

A LIFELINE ENROLLMENT AND REVALIDATION MODEL FOR A COMPETITIVE LOCAL EXCHANGE INDUSTRY IN NEW YORK STATE

Designed to Efficiently:

- Satisfy Public Service Commission Lifeline Program Responsibilities
- Establish a Secure Common Data Base
- Offer Lifeline to All Categorically Eligible Households
- Provide Privacy Protections Required by Law
- Simplify Lifeline Outreach and Revalidation Procedures
- Eliminate the Need for Lifeline Quotas or Numerical Goals

1. All Providers Would Adopt the Lifeline Income and Categorical Eligibility Criteria Previously Approved by the Public Service Commission.

To qualify for Lifeline service today,²³ a customer, regardless of local exchange provider, must 1) have income below 150% of the official poverty level as set by the federal government or below 60% of the state's median income for the customer's family size,²⁴ or 2) be a recipient of at least one of the following types of income-tested government assistance: Aid to Families With Dependent Children (AFDC or ADC), Home Relief (HR), Medical Assistance (Medicaid), Food Stamps, Supplemental Security Income (SSI), Home Energy Assistance Program (HEAP), Veterans Disability Pension or Veteran's Surviving Spouse Pension.²⁵

At least one Lifeline provider, NYNEX, has established arrangements with community based organizations that serve low-income consumers where the staff of those organizations distribute Lifeline applications, interview applicants to inquire into income

See New York PSC Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of New York Telephone Company for Telephone Service, Order Modifying Lifeline Program, Case 90-C-0191, issued and effective July 27, 1992: "[W]e want to insure the continuation of affordable, universal service to all customers." Id. at 2. Accord N.Y.S. Department of Public Service (DPS) Staff "Report on New York Telephone Company's Lifeline Program," dated October 28, 1991, and issued by the PSC November 20, 1991 (Staff Lifeline Report), pp. 9-10: "[T]he Commission has stated its commitment to universality of telephone service." Id. at 9.

This income test matches the eligibility criteria for assistance under the Home Energy Assistance Program (HEAP) as administered in New York State.

The last two categories of eligibility apply to all incumbent local exchange providers except Citizens Telecommunications and Alltel.

eligibility, and then certify qualifying applicants as "Lifeline eligible" to NYNEX.26

Current Lifeline eligibility criteria should be continued.

2. Each Lifeline Provider Should Offer and Promote Lifeline Service to Encourage Applications and to Extend Lifeline Benefits to Eligible Customers.

Telephone Lifeline is a safety-net program designed to promote the nation's and New York's long standing commitment to universal service, and assure that the progression to market based pricing during the emergence of local exchange competition does not leave low-income consumers unable to obtain and maintain basic local exchange telephone service. The availability of telephone Lifeline works hand-in-glove with the Commission's TEFPA rules, the billing and collection tiered bucket payment hierarchy system, and the design and effectiveness of Lifeline promotion and marketing programs to achieve a meaningful program for New York's low-income telecommunications consumers.

The overwhelming majority of low-income households eligible for Lifeline have access to an incumbent local exchange provider with a Lifeline enrollment program. All providers of Lifeline service should be obliged to participate in similar enrollment programs. Clearly, it would be wrong to compromise New York's commitment to an effective Lifeline program due to the emergence of competition. In PULP's judgment, the existence of an excellent Lifeline program has been an important factor that has comforted decision makers that the movement towards market-based competition can be achieved without unacceptable social consequences. The obligation to effectively promote Lifeline in a competitive market can and should be accomplished in a manner that is administratively efficient and that minimizes the need for regulatory intervention.

No provider, to PULP's knowledge, accepts applications that require the provider to determine whether an applicant's income qualifies for its Lifeline program.

3. Competition for Lifeline Customers May Emerge and Be Advantageous to Lifeline Customers. Uniform Minimums, However, Are Needed to Assure That Lifeline Customers Receive the Benefits of the Lifeline Program, and to Allow Cost Efficient Joint Lifeline Marketing Arrangements.

Measured service customers of NYNEX and Rochester Telephone pay \$1 a month for residential access. The amount they spend on usage is subject to their own decisions. They receive the exact same service that other residential customers receive; they just pay less for access. Generally, other New York providers do not offer measured rate service, and offering such service would entail considerable expense. Consequently, PULP proposes that all Lifeline providers offering residential message rate service, now or in the future, be required to offer Lifeline access for no more than \$1 a month and usage for no more than the rate charged to other similarly situated residential customers.²⁷

Flat Rate Lifeline customers of NYNEX pay \$2 a month for the residential access costs implied in their monthly flat rate. Those customers pay for unlimited usage even though a more informed economic decision would cause many of them to select measured rate service. The customers of most other New York providers must pay for unlimited local usage even when they make few local calls, and even though they would choose measured service if they had a choice. Consequently, PULP proposes that all providers of Flat Rate service be required to offer a Lifeline rate that minimally equates to the \$4.60²⁸ discount extended by NYNEX to its Flat Rate Lifeline customers. Since NYNEX's \$4.60 discount is about 30% of its flat rates on average, this can be accomplished by applying a 30% discount to each Lifeline provider's non-Lifeline Flat Rate offerings²⁹ to arrive at Lifeline Flat Rate offerings, provided that the resulting Lifeline rates are not greater than the incumbent's Lifeline Flat Rates offering.

Connection and reconnection charges for NYNEX and Rochester Telephone Lifeline customers are \$10, and can be paid in twelve equal monthly payments. Also, Lifeline customers are not subject to security deposits, and have no charges assessed for beginning or ending Lifeline service. In the past, standard connection/reconnection charges and security deposit requirements posed significant barriers to obtaining and maintaining telephone service for low-income consumers. The customers of other New York providers pay differing amounts for connection/reconnection; some pay less than

²⁷ A Lifeline customer would never be precluded from selecting an available rate plan because of his or her Lifeline status. The Lifeline benefit would be superimposed on any such plan.

Lifeline customers also receive a waiver of the \$3.50 monthly Subscriber Line Charge.

²⁹ Exclusive of the waiver of the Subscriber Line Charge.

\$10 while some pay more. Consequently, PULP proposes that all Lifeline providers be required to provide Lifeline connection/reconnection for no more than a \$10 charge, (provided that such charges shall in no event be greater than the provider's corresponding standard residential charges), that they allow no security deposits on Lifeline accounts, and that they be prohibited from charging fees for changes to or from Lifeline rates.

Nothing would prohibit local exchange service providers from promoting, improving and increasing Lifeline benefits to attain higher penetration of the Lifeline market segment. Competition for Lifeline customers may emerge, and nothing in this model would prohibit providers from conducting additional Lifeline outreach.

4. A Common Data Base is Essential to Efficiently Enroll and Revalidate Lifeline Eligible Consumers.

Unless a local exchange provider undertakes the function of independently evaluating whether each Lifeline applicant has household income that satisfies Lifeline eligibility criteria, some proxy must be used. To PULP's knowledge no local exchange provider has expressed any interest in undertaking such a labor and cost intensive function, and no one has suggested that such an activity by a telephone provider would be desirable, cost-effective or appropriate. The second-best approach then, is to aggressively pursue "categorical eligibility" as an alternative. Categorical eligibility signifies that a person is eligible for a program, here for enrollment in Lifeline, because that person has been found eligible for a different income-tested program by a governmental body that investigated and determined income eligibility for that linked program.

A significant limitation of using categorical eligibility is that almost half of the households eligible for Lifeline who would also be income eligible for one or more of the categorical programs have not enrolled in any of those programs. The advantages of using categorical eligibility are the absence of the need for independent income testing, the ability to interface with data bases maintained by government agencies to enroll eligible customers, the ability to conduct efficient and targeted outreach to qualifying households who are not customers and to periodically revalidate eligibility with minimal cost and process. In PULP's opinion, the advantages substantially outweigh the disadvantages. Categorical eligibility allows use of a particularly effective data base tool to identify those low-income consumers who have taken steps to qualify for some form of assistance based upon the limitations of their household's income. Together with community based organization certification procedures, like those currently used by NYNEX, a categorical eligibility system can achieve high Lifeline enrollment percentages of the targeted consumer population.

Concentration on a categorical eligibility driven Lifeline enrollment and revalidation program, allows for the engagement of government provided data bases that

identify eligible households with a common industry data base to 1) identify customers who qualify for Lifeline, 2) allow cost effective outreach to Lifeline eligible consumers who are identified as customers of a particular provider and those who are not, and 3) provides a simple means to periodically revalidate eligibility for Lifeline discounts. Without categorical eligibility and access to government furnished information to identify eligible customers, each Lifeline provider would have to establish protocols for verifying initial eligibility, conduct broad based outreach efforts, periodically require submissions from Lifeline customers to verify their continuing Lifeline eligibility, and establish thresholds or quotas for initial and ongoing Lifeline enrollment to satisfy public policy goals with respect to Lifeline as part of universal service obligations.

Availability Of and Access to Needed Data Bases: Information about categorically eligible households who receive AFDC, HR, Food Stamps, HEAP, Medicaid or SSI are currently made available on a monthly basis to NYNEX. Information provided includes names, addresses, Social Security Numbers, fiscal district codes and case identification numbers. About 98% of the data is provided by the New York State Department of Social Services (DSS), and the remaining 2% is provided by the New York City Community Development Agency (CDA). For overriding administrative, cost, privacy and bureaucratic reasons those agencies will provide their data only to a single entity that must maintain custody and guard the provided data.

For a common data base system to work a single entity would have to gather data from all providers in order 1) to identify which provider's customers should be enrolled in its Lifeline program after use of automatic enrollment outreach procedures, 2) to identify which consumers eligible for Lifeline should receive a neutral source targeted mailing encouraging Lifeline enrollment of consumers not identified as customers of a particular provider, and 3) to advise a provider that a Lifeline customer no longer appears eligible for Lifeline rates.

Data Base Creation, Maintenance, Handling and Administration: To satisfy the needs of DSS and CDA, to address overriding privacy and confidentiality concerns, and to achieve satisfactory cost efficiencies, it is essential to utilize the services of a single strictly neutral data base administrator whose functions would include: 1) obtaining data from government agencies and providers, 2) establishing computer file standards, 3) devising and running utility-programs on data received to best achieve the objectives of an enrollment and revalidation common Lifeline data base, 4) coordinating, supervising or conducting "automatic enrollment" and "send-back enrollment" outreach mailings, 5) preparing and providing resulting outreach information to the appropriate

Telephone numbers are not "mandatory fields" on DSS applications. The fields when completed are not verified and often represent "contact numbers" as opposed to the applicant's own telephone number. Telephone number data is so unreliable that it is not provided by DSS as part of the list exchange with NYNEX.

providers, 6) maintaining privacy and confidentiality safeguards as required by federal and state laws and regulations, requirements of the Public Service Commission, contracts with government agencies, and agreements with participating providers, and 7) maintaining and reporting Lifeline enrollment and revalidation information to the Public Service Commission, participating providers, and other interested parties.³¹

Privacy Protections of Persons Eligible for Lifeline and of Customers
Receiving Lifeline: In setting up NYNEX's Lifeline list exchange protocols, PULP, DSS,
CDA and DPS Staff were very attentive to the privacy policy and legal issues involved in
an automatic enrollment list exchange initiative. PULP took on the roll of developing
and proposing ways to lawfully utilize government-benefit lists exclusively for Lifeline
purposes while protecting the privacy rights of the beneficiaries. Ultimately an
agreement, drafted by PULP, but signed by DSS and the Company memorialized the
obligations of NYNEX regarding confidentiality and the protocols of the list exchange
process.³²

In the course of working through the privacy issues PULP sought and obtained approval for the list exchange from the federal Department of Health and Human Services (HHS).³³ Without their approval, which took the form of a finding that a list exchange for Lifeline program purposes was a "routine use" under relevant statutes, the exchange could not include SSI recipient data. HHS approval was conditioned on blocking the entitlement program category from the data supplied, *i.e.*, the data files could not indicate that a person receives SSI as distinguished from the other categorical eligibility programs.

DPS staff set up focus groups around the state to discuss low-income privacy concerns, the content of outreach mailings, and similar issues. One result was a broad

A possible candidate to administer a common Lifeline data base for Lifeline enrollment and revalidation is the New York Intrastate Access Settlement Pool, Inc. As a technical organization, the Settlement Pool appears to have access to resources that can readily be adapted to perform the needed functions. The costs associated with performing the functions should be quite modest, and could be assessed through existing Settlement Pool mechanisms.

Copies are available from PULP or DPS Staff working on this topic. In reviewing that document the reader will note that the New York City Community Development Agency is also a signatory. That agency, for reasons peculiar to New York's politics and bureaucracy, has exclusive control over about two percent of the combined list that is subject to the list exchange process.

³³ Copies of PULP's petition to HHS, the approval letter from HHS, and a PULP memorandum discussing privacy and confidentiality requirements, are available from PULP or DPS Staff working on this topic.

consensus that a mailing from DSS would be perceived by clients with great distrust, and that a mailing from NYNEX would be unacceptable because of privacy concerns and a perception that the offer was a promotional gimmick. The Commission was hesitant to use its letterhead because of a concern that it might be viewed by new competitors as inappropriately pro-NYNEX. For those reasons, it was decided that the letters should go out on PULP's letterhead.³⁴

In a multi-provider environment the data base administrator would enter into a detailed confidentiality agreement with the governmental agencies providing the data, and would establish procedures and safeguards to comply with its requirements.³⁵ Among other limitations, the data is provided exclusively for the purpose of enrolling and periodically revalidating eligibility in the Lifeline program. Any other use or exchange of the information is strictly prohibited.

5. Cost Efficiency, Competitive Neutrality, and the Absence of Other Lifeline Related Regulatory Obligations, Can Be Achieved by Using a Common Lifeline Data Base for Enrollment and Revalidation.

A) A Common Lifeline Data Base Should be Used for Outreach.

To conduct Lifeline outreach in a manner that achieves PSC goals, is operationally cost efficiently and strictly competitively-neutral, outreach should include uniform "automatic enrollment" and "send-back enrollment" elements. Under this model the existing NYNEX Lifeline outreach model would be modified and adopted for use in a competitive local exchange provider environment.

1) Current NYNEX Lifeline list exchange procedures work basically as follows:

Once a month DSS and CDA send their lists of categorically eligible recipients to NYNEX's data center. The Company uses tape-to-tape computer utility-programs to edit out households outside its service territory, duplicates, those coded as "undomiciled" or "homeless," addresses that include "home" or "hospital," and those who are already on the Company's Lifeline rate. In it's initial run NYNEX randomly selected about 750,000 names from the remaining names, and that cleaned list became the Company's "outreach" list. That outreach list was used in a computer matching program to identify as many matches with the Company's customer files as possible, based on detailed protocols that apply to Social Security Numbers, case identification numbers, names, addresses and zip codes. The names identified as Company customers were transmitted

³⁴ All letters require prior DSS and NYNEX approval.

Each local exchange service provider would enter into a counterpart privacy and confidentiality agreements with respect to the data.

on a secure computer file to an independent mailing house that in turn mailed a personalized "match" letter to each "matched" name. That letter congratulated the recipient for being entitled to the discount Lifeline rate, and advised the recipient that his/her rates would be reduced in thirty days unless an opt out call was made to a specified 800 number. The 800 number was maintained by the mailing house company, and that organization blocked the names of those who opted out before sending the tape to NYNEX. The outreach list names not identified as customers were sent on a separate secure computer file to the independent mailing house that in turn mailed a personalized "send-back" letter to each "non-matched" name. That letter told each recipient that they were eligible for Lifeline, the minimal benefits of participation, and that all they needed to do was to complete and mail an attached (by perforation at the bottom of the letter), form directly to the Company and their account would then be converted to the discount Lifeline rate; or if they didn't have telephone service, that the Company would contact them to establish service for the \$10 connection charge. The mailing house pre-printed identifying data on the form to keep it very simple, and included a postage-paid envelope. Those who do not reply to the "send-back" letter receive a second-chance follow-up letter ninety days later. 36 Every six months after the initial outreach effort described above, the process is repeated in some fashion for categorically eligible households not yet enrolled in Lifeline.

2) In a competitive local exchange provider environment the NYNEX Lifeline outreach model would be adopted and modified as follows:

Once a month DSS and CDA would send their lists of categorically eligible program recipients to the data base administrator. The data base administrator would combine provider supplied customer data³⁷ into a single computer file.³⁸ The data base administrator would use tape-to-tape computer utility-programs to edit out of the DSS and CDA files households outside the combined service territories (if any), duplicates, those coded as "undomiciled" or "homeless," addresses that include "home" or "hospital," and those who are already on the Lifeline rate of any provider. In an initial run the data base administrator would randomly select a predetermined number of the remaining

³⁶ Copies of the letters are available from PULP or DPS Staff working on this topic.

Minimally, names, addresses, zip codes, Lifeline status, and when available, Social Security Numbers and public assistance case identification numbers.

A possible alternative to this approach would be for the data base administrator to prepare and provide to each local exchange service provider a limited-access combined computer file of cleaned DSS and CDA data, together with a computer matching program. The data file would be non-addressable, *except* it would allow the provider who received it to mark the file with an indicator of persons identified in its customer records as Lifeline customers and as non-Lifeline customers. That file would then be returned to the data base administrator.

names,³⁹ and that cleaned list would become the "outreach" list.

That outreach list would then be used in a computer matching program to identify as many matches with the combined provider supplied customer files as possible, based on detailed protocols that apply to Social Security Numbers, case identification numbers. names, addresses and zip codes. The names identified as Company customers would then be transmitted on a secure computer file to an independent mailing house⁴⁰ that in turn would mail a personalized third-party⁴¹ "match" letter to each "matched" name. That letter would congratulate the recipient for being entitled to the discount Lifeline rate, and advise the recipient that his/her's named current local exchange provider rates would be reduced in thirty days unless an opt out call is made to a specified 800 number. The 800 number would be maintained by the mailing house company, and that organization would remove the data corresponding to mail returned as undeliverable and block the names of those who opted out within thirty-five days of the mailing, before returning the tape to the data base administrator. The data base administrator would then forward the names and identifying information of the remaining customers to the customer's local exchange provider, and each provider would enroll those customers in its Lifeline program within thirty days.

The outreach list names not identified as customers of any provider would be sent on a separate secure data computer tape to the independent mailing house that in turn would mail a personalized third-party⁴² "send-back" letter to each "non-matched" name.⁴³ That letter would advise each recipient of their eligibility for Lifeline, specify the minimal benefits, and indicate that all they need to do to obtain Lifeline service is to complete and mail an attached (by perforation at the bottom of the letter), form in an enclosed postage-paid envelope. The letter would list all local exchange providers that offer service in the geographic area, but the letter would follow two tracks – one for those who

While PULP is not presently able to suggest a firm number, it suggests that the 750,000 number used by NYNEX in its first list exchange outreach mailing appears to be a reasonable number for the first competitive model Lifeline outreach effort.

⁴⁰ Conceptually, there is no reason that the data base administrator could not undertake this function internally. However, use of a professional mailing house is likely to be more efficient and cost effective.

PULP could continue to be that third-party. All letters would be subject to approval by DSS and the data base administrator

PULP could continue to be that third-party. All letters would be subject to approval by DSS and the data base administrator.

⁴³ As part of the personalization, the form attached to each letter would include preprinted identifying data to simplify completion and assure accuracy on the returns.

already have telephone service and another for those without telephone service. The track for those without telephone service would encourage them to check-off on the attached form an available provider and advise them that the selected provider would contact them within thirty days to establish service for a connection charge of no more than \$10.44 The track for those with telephone service would indicate that within thirty days of returning the attached form, their account would be converted by their current local exchange provider to the discount Lifeline rate. The data base administrator would forward the returns to the appropriate providers, and each provider would contact potential new customers to arrange Lifeline service within thirty days; and process changes of account names and changes of service classifications, as may be appropriate, within thirty days.

Those who do not reply to the "send-back" letter and whose original letters were not returned as undeliverable, would receive a second-chance follow-up letter ninety days later. Every six months after the initial outreach effort described above, the process would be repeated in some fashion for categorically eligible households not yet enrolled in Lifeline.

- 3) The modified NYNEX Lifeline outreach model described above eliminates the need for lifeline quotas and Commission imposed outreach programs. Under the model proposed here, local exchange service providers would retain flexibility to exceed the standard lifeline program and could choose to further enhance and promote Lifeline as they see fit.
- B) A Common Lifeline Data Base Should be Used for Revalidation.
- 1) The current NYNEX Lifeline revalidation procedures work basically as follows:

The current NYNEX Lifeline list-exchange system also sets up a process for revalidation. Its effect is to convert categorically eligible Lifeline customers to the standard residential rate about six months after they no longer receive benefits from at least one of the categorical programs. The protocols in the agreement between NYNEX, DSS and CDA require NYNEX to compare its existing Lifeline account records with monthly data provided by DSS and CDA for four consecutive months. If there is no

While it is premature to suggest details of a proposed letter, there would probably be a need to indicate which providers offer measured service, flat rate service or both, and the monthly Flat Rate Lifeline charge that applies at the customer's address.

⁴⁵ A sentence could be added indicating how they could obtain Lifeline service if they chose to change from their current to a different local exchange provider.

"match" during that process, NYNEX notifies the customer of its intent to discontinue the Lifeline rate unless the customer submits information showing current eligibility. A second reminder notice is also required. If the customer does not furnish the needed information, service is converted to standard service sixty days after the initial customer notice.

2) In a competitive local exchange provider environment the NYNEX Lifeline revalidation procedures would be adopted and modified as follows:

The data base administrator would compare end-of-month Lifeline account records for all local exchange service providers with monthly data provided by DSS and CDA for four consecutive months. If there is no "match" during that process, the data base administrator would notify the appropriate provider who in turn would notify the customer of its intent to discontinue the Lifeline rate unless the customer submits information showing current eligibility. Each provider would monitor responses and send a second reminder notice if no response to the first notice is received. If the customer does not furnish the needed information, each provider would convert the customer's service classification to standard residential service sixty days after the initial customer notice. The effect of this process would be to convert categorically eligible Lifeline customers to the standard residential rate about six months after they no longer receive benefits from at least one of the categorical programs.

6. Additional Questions and Ideas.

Question – Can a limited purpose on line computer link be established to verify the Lifeline eligibility of a new local exchange provider customer who calls a local exchange service provider to obtain service?

Answer – If access to the information provided by DSS and CDA to the data base administrator can be achieved by entering a name and case identification number, such a system might be possible. Prerequisites would include limited access to the on line link, and consent from DSS and CDA. The case identification number is a unique indicator that is generally only available from a person receiving benefits from one of the programs that qualify as categorical eligibility programs for Lifeline.

Question - Once number portability becomes pervasive might it be possible for local exchange service providers to access the Lifeline data base on line to test the eligibility for Lifeline of new accounts?

Answer – Assuming that appropriate safeguards to the Lifeline data base can be devised, and that DSS and CDA do not object, and that privacy concerns do not preclude placing those numbers in a data base, then on line access for both enrollment and revalidation would be possible.

Respectfully submitted,

Public Utility Law Project of New York, Inc. B. Robert Piller, Esq. Executive Director

Date: July 29, 1995

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

EXHIBIT "C"

MODEL ENROLLMENT LETTERS FOR NYNEX LIFELINE PROGRAM





Public Interest Lawyers For Low-Income Utility Consumers

39 Columbia Street Albany, New York 12207-2717

May 18, 1995

















Congratulations. You qualify for "Life Line," the lowest "basic telephone service" rate from NYNEX. This letter explains how you will receive it and save.

It's the same "basic telephone service" you already have.
It simply saves you money.

Life Line saves you at least \$8.10 every month on your phone bill.

- o Receive unlimited calls
- Connect to a long distance telephone company
- Make calls to toll free 800 numbers, emergency services, and to the telephone business office

What's Extra?

- o Long distance calls
- Outgoing local calls if you have measured service
 Optional services, such as call-waiting

The price for these extras is the same as the price without Life Line.

With Life Line, you simply save about \$100 a year on your telephone bill.

How do you get this Life Line discount?
There's nothing that you need to do.

There is no fee for Life Line — now or ever.

One month from now, NYNEX will start billing you at the lower rate.

NYNEX is prohibited from using the fact that your are eligible for Life Line for any purpose other than offering and administering the Life Line discount rate. If for some reason you do not wish to receive the discounted Life Line rate, just call toll-free 1-800-622-0131, weekdays 9 to 5, within 30 days of the date of this letter, and NYNEX will not be allowed to enroll you in Life Line. More than half-a-million New Yorkers already save with Life Line discount telephone service.

Sincerely yours,

B. Robert Piller Executive Director

B Robert Piller

Public Interest Lawyers For Low-Income Utility Consumers 39 Columbia Street Albany, New York 12207-2717

He aquí las buenas noticias

Ahora usted puede obtener el mismo servicio de teléfono básico que tienen otros clientes de NYNEX por el bajo precio de \$1 al mes — un ahorro mensual de por lo menos \$8.10.

La carta adjunta explica los detalles pero es en inglés. Si quiere una copia en español por favor llame gratis al número, 1-800-622-0131.

Atentamente.

B. Robert Piller Director Ejecutivo



















Public Interest Lawyers For Low-Income Utility Consumers

39 Columbia Street

Albany, New York 12207-2717

Mayo 18, 1995

Felicidades. Usted tiene derecho a "Línea Económica" la tarifa más baja por "servicio de teléfono básico" de NYNEX. Esta carta le explica cómo va a recibirlo y cómo va a ahorrar.

Es el mismo servicio de teléfono básico que ya tiene. Simplemente le ahorra dinero. Línea Económica le ahorra por lo menos \$8.10 cada mes en su factura telefónica.

Reciba un número ilimitado de llamadas.
Conecte con una compañía telefónica de larga distancia.

 Efectúe llamadas gratis a los números sin cargo con prefijo 800, a los números de servicios de emergencia y a la oficina telefónica de servicios al cliente.

Oué es adicional?

o Llamadas de larga distancia.

- Efectuar llamadas si tiene un servicio de cargo por llamada.
- o Servicios opcionales, tales como servicio de Llamada en Espera.

El precio por estos servicios adicionales es el mismo que el precio sin Línea Económica.

Con Línea Económica usted ahorra cerca de \$100 al año en su factura telefónica.

¿Cómo obtiene este descuento de Línea Económica? Usted no necesita hacer nada.

No se le carga ninguna tarifa por Línea Económica, ni ahora ni nunca. De aquí en un mes, NYNEX le empezará a facturar con la tarifa más baja.

A NYNEX se le prohíbe que se base en el hecho de que usted tiene derecho a la Línea Económica para cualquier otro propósito que no sea el de ofrecer y administrar la tarifa de descuento Línea Económica. Si por alguna razón no deseara recibir la tarifa de descuento Línea Económica, llame al número sin cargo 1 800-622-0131, los días hábiles de 9 a 5 dentro de un período de 30 días a partir de la fecha de esta carta y a NYNEX no se le permitirá registrarle como usuario de la Línea Económica. Más de medio millón de residentes neoyorquinos ya están ahorrando con el servicio telefónico de descuento Línea Económica.

Atentamente,

B. Robert Piller
Director Ejecutivo

but Piller



Public Interest Lawyers For Low-Income Utility Consumers

39 Columbia Street

Albany, New York 12207-2717

May 18, 1995

















Here's good news. You can have the same "basic telephone service" that other NYNEX customers have, for as little as \$1 a month — a monthly savings of at least \$8.10.

"Life Line" is a special low rate for recipients of government assistance. "Life Line" service simply saves you money. And if you do not have telephone service now, NYNEX will start "Life Line" service for you for just \$10.

- o Receive unlimited calls
- \circ Connect to a long distance telephone company
 - and
- Make calls to toll-free 800 numbers, emergency services, and to the telephone business office

What's Extra?

- o Outgoing local calls if you have measured service
 - Long distance calls
 - Optional services, such as call-waiting

The price for these extras is the same as the price without Life Line.

Just complete and sign the enclosed card and mail it to NYNEX in the postage-paid envelope. NYNEX will do the rest. "Life Line" saves you about \$100 each year for your telephone service.

If you have any questions, please call NYNEX at its toll free "Life Line" number, 1-800-622-0131. Call on weekdays between 9 a.m. and 5 p.m.

Sincerely yours.

B. Robert Piller

B. Robert Piller
Executive Director

P.S. If you have a past due balance with NYNEX now, or if you were disconnected for nonpayment, you can still get Life Line service. Call NYNEX for details. NYNEX is prohibited from using your Life Line eligibility for any other purpose than offering the Life Line discount program

COMPLETE AND MAIL TO SAVE \$\$\$ WITH LIFE LINE

NYNE

Customer Response Center

435 West 50th Street, 10th Floor, New York, NY 10019

If you have NYNEX service now, simply list your phone number here.

| If you do not have NYNEX servileave a message for you to call us. | ice now, simply list a number where we can call you, or |
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| | . We will contact you soon |
| | Please read and sign: |
| <u>-</u> | e else's Federal Income Tax Return form. I give NYNEX ent of Social Services permission to exchange information emain eligible for Life Line. |
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Public Interest Lawyers For Low-Income Utility Consumers

39 Columbia Street

Albany New York 12207-2717











William F. Smith 25-15 50th Street Woodside, NY 11377 Month xx, 1994

Dear Mr. Smith:

"Life Line" is the special low telephone rate that I wrote to you about a while ago. Life Line saves you about \$100 each year for your telephone service. And if you do not have telephone service now, NYNEX will start "Life Line" service for you for just \$10. So here is another chance for you to have NYNEX telephone service for as <u>little as \$1 a month — a monthly saving of at least \$8.10.</u>

- Receive unlimited calls • Connect to a long distance telephone company and
- Make free calls to toll-free 800 numbers, for emergency services, and to the telephone business office

What's Extra?

- Outgoing local calls if you have measured service • Long distance calls
- Optional services, such as touch tone and call-waiting

The price for these extras is the same as the price without Life Line.

Just complete and sign the enclosed card and mail it to NYNEX in the postage-paid envelope. NYNEX will do the rest.

If you have any questions, please call NYNEX at its toll free "Life Line" number, 1-800-555-5000. Call on weekdays between 9 a.m. and 5 p.m.

Sincerely yours.

Executive Director

B. Robert Piller

P.S. If you have a past due balance with NYNEX now, or if you were disconnected for nonpayment, you can still get Life Line service. Call NYNEX for details. NYNEX is prohibited from using your Life Line eligibility for any other purpose than offering the Life Line discount program.

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Customer Response Center

435 West 50th Street, 10th Floor, New York, NY 10019

| If you have NYNEX service now, simply list your phone number here. |
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| If you do not have NYNEX service now, simply list a number where we can call you, or leave a message for you to call us. |
| We will contact you soon. |
| Please read and sign: |
| I am not a dependent on someone else's Federal Income Tax Return form, I give NYNEX and the New York State Department of Social Services permission to exchange information from time to time to verify that I remain eligible for Life Line. |

Signature _____ Date____

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